

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Tyree Darrell

Case: 2:23-mj-30319

Case No. Assigned To : Unassigned

Assign. Date : 8/1/2023

USA V. SEALED MATTER (CMP (CMC)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 17, 2023 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Felon in possession of a Firearm

This criminal complaint is based on these facts:

Continued on the attached sheet.



Complainant's signature

Jaclyn Kocis-Maniaci, Task Force Officer (ATF)
Printed name and title



Judge's signature

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: August 1, 2023

City and state: Detroit, Michigan

Hon. Kimberly G. Altman, U.S. Magistrate Judge
Printed name and title

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT**

I, Task Force Officer Jaclyn Kocis-Maniaci, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION AND AGENT BACKGROUND

1. I am a police officer with the City of Detroit. I have been with the Detroit Police Department since 2003. I became a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) in January of 2017. During my career, I have been involved in numerous investigations involving firearms and narcotics cases resulting in successful federal and state prosecutions.

2. I make this affidavit from personal knowledge based on my participation in this investigation. The information comes from witnesses interviewed by law enforcement, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

3. This affidavit is for the limited purpose of establishing probable cause that Tyree DARRELL (DOB xx/xx/1998) has violated 18 U.S.C. § 922(g)(1), felon in possession of a firearm, and does not contain all details or facts known to law enforcement related to this investigation.

II. PROBABLE CAUSE

4. On July 17, 2023, Detroit Police officers (DPD) observed a blue 2023 Mazda CX-50 driving erratically in the area of Hazelwood and Linwood, in the City of Detroit. DPD officers initiated a traffic stop with their overhead lights and siren.

5. The vehicle came to a stop and an unknown black male wearing a blue baseball cap, white t-shirt, and black jogging pants (later identified as Tyree DARRELL), exited the vehicle from the passenger side and fled on foot into a residential area.

6. An officer saw DARRELL clutching an object in his right-side waistband as DARRELL fled the scene. After additional units arrived, officers began canvassing the area in an attempt to locate DARRELL.

7. While canvassing the area for DARRELL, DPD officers were tracking to an area which led them to the rear of 8942 Petoskey. While they were approaching the back of the location, DARRELL yelled, “hey are y’all looking for who ran, it’s me, I ran because I have warrants.” DPD officers detained DARRELL from the porch in the rear of 8942 Petoskey.

8. Because DARRELL was clutching an object at his waistband as he fled, officers suspected he was armed. However, officers did not locate a weapon on DARRELL when he was taken into custody, so the officers requested assistance from a canine officer to conduct an article search for a discarded firearm.

9. An MSP Canine unit arrived on the scene and assisted with an article search. During the course of the article search, the canine unit reached the back of 8942 Petosky and searched the area where DARRELL was located before he was taken into custody. The canine unit located a KAHR model CW, .45 caliber pistol, Serial number SG3006, loaded with several rounds of ammunition, in the area next to the rear porch at 8942 Petoskey. DPD officers recovered the pistol and placed it into evidence.

10. Per the Law Enforcement Information Network (LEIN), DARRELL had an active felony warrant for assault with intent to do great bodily harm issued by the 36th District Court in Detroit, Michigan.

11. On July 18, 2023, a computerized criminal history check showed that Tyree DARRELL was previously convicted on August 8, 2017, for felony Aiding and Abetting Carjacking in the United States District Court for the Eastern District of Michigan. DARRELL was sentenced to serve 21 months imprisonment for that conviction. Therefore, DARRELL knew at the time he possessed the firearm on July 17, 2023, he had previously been convicted of an offense punishable by more than one year of imprisonment.

12. On July 28, 2023, ATF Special Agent Kara Klupacs, who is specially trained in the interstate nexus of firearms, advised, based upon the verbal descriptions provided, without physically examining the firearm, that the KAHR model CW, .45

caliber pistol, Serial number SG3006, is a firearm as defined under 18 U.S.C. § 921, and was manufactured outside of the State of Michigan after 1989, and therefore had traveled in and affected interstate commerce.

III. CONCLUSION

13. Probable cause exists that Tyree DARRELL, a convicted felon, did knowingly possess a firearm that had previously traveled in interstate and/or foreign commerce, in violation of 18 U.S.C. § 922(g)(1).

Respectfully submitted,



Jaclyn Kocis-Maniaci, Task Force Officer
Bureau of Alcohol, Tobacco, Firearms
and Explosives

Sworn to before me in my presence and/or
by reliable electronic means.



Hon. Kimberly G. Altman
United States Magistrate Judge

Dated: August 1, 2023